

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

K.MIZRA LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No.: 6:20-cv-01031-ADA

Jury Trial Demanded

**NOTICE OF UNOPPOSED REQUEST TO DEPOSE
WITNESS AFTER CLOSE OF FACT DISCOVERY**

Pursuant to the Court's March 7, 2022 Amended Standing Order Regarding Joint or Unopposed Request to Change Deadlines, Plaintiff K.Mizra LLC ("K.Mizra") submits this Notice of Unopposed Request to Depose a Witness after the close of fact discovery.

Fact discovery in this case closes on Friday, March 31, 2023, with expert reports due on April 14, 2023. K.Mizra is taking the Fed. R. Civ. P. 30(b)(6) deposition of Defendant Cisco Systems, Inc. ("Cisco") this week and next. For some of the noticed categories, the appropriate witness is not available before March 31, but is available on Wednesday, April 5, 2023. Cisco does not oppose K.Mizra's request to depose Cisco on these topics after the close of fact discovery.

Thus, the parties agree that K.Mizra may complete Cisco's deposition after the close of fact discovery by deposing the remaining witness on Wednesday, April 5, 2023.

Dated: March 24, 2023

Respectfully submitted,

By: /s/ Paul S. Cha

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on March 24, 2023, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

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